

**REMARKS**

Claims 1, 4, 5, 7, 10, 13–16, and 19–21 were previously pending in this application. By this amendment, claim 21 has been amended. As a result claims 1, 4, 5, 7, 10, 13-16, and 19–21 are pending for examination with claims 1, 16, 19 and 21 being independent claims. No new matter has been added.

**Rejection under 35 U.S.C. §112**

The Office Action rejected claim 21 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to point out and distinctly claim the subject matter which applicant regards as the invention. Claim 21 is rejected because there is insufficient antecedent basis for the limitation “the apparatus,” and further because it is unclear what is referred to by “the database” as used in the phrase “and store the authoritative mapping in the database” at line 7. Claim 21 has been amended to obviate this rejection. Accordingly, withdrawal of the rejection of claim 21 under 35 U.S.C. §112, second paragraph, is respectfully requested.

**Rejections Under 35 U.S.C. §103**

The Office Action rejected claims 1, 4-5, 7, 10, 13-16, and 19-21 under 35 U.S.C. §103(a) as being unpatentable over U.S. Publication No. 2002/0178383 to Hrabik et al. (hereinafter Hrabik) in view of Albitz et al. (DNS and BIND) (hereinafter Albitz). Independent claims 1, 16, 19, and 21 are included in this rejection. In response, Applicant submits the following remarks.

Applicants respectfully assert that claims 1, 16, 19, and 21 patentably distinguish over Hrabik and Albitz, alone or in proper combination, because neither Hrabik or Albitz teach or suggest either: “comparing the first mapping to the second mapping and identifying at least one discrepancy between the first and second mapping,” as recited in each of claims 1, 16, and 19; or a detector “further adapted to compare the first mapping to the second mapping and to identify at least one discrepancy between the first mapping and second mapping,” as recited in claim 21, as amended herein. (Emphasis added.)

Hrabik is directed to a system for verifying the integrity of devices on a target network. (Hrabik, Abstract.) The system has security subsystems and a master security system hierarchically connected to the security subsystems via a secure link. (Hrabik, Abstract.) The

target network includes various intrusion detection devices, which may be part of the security subsystem. (Hrabik, Abstract.) Each intrusion detection device generates a plurality of event messages when an attack on the network is detected. (Hrabik, Abstract.) The security subsystem collects these event messages, correlates, and analyzes them, and performs network scanning processes. (Hrabik, Abstract.) If certain events warrant additional scrutiny, they are uploaded to the master security system for review. (Hrabik, Abstract.)

Hrabik also discusses, in Paragraph [0069]:

In addition to the vulnerability and visibility scans, the master system 60 also verifies services that directly affect the target network's connectivity but are typically out of the network's control. This verification assessment ensures that company's domain name was not "hijacked." The master security system conducts a verification assessment of all information sources involved in network connectivity verifying information from a root domain name servers all the way through to a primary and a secondary web servers. The verification scan is performed for the entire IP address group of the target company. For example, when a target company has six IP addresses four of which are open and utilized and two of which are blocked and not accessible, the verification scan determines whether the blocked addresses remain unaccessible and whether the open addresses remain accessible. The assessment also includes a verification that when users are trying to access the network's website by typing "www.company.com," they get to the proper website and their e-mail goes to the proper server. The master system also verifies information at the Whois database of the registration provider to ensure that contact and authorization information has not been changed. To protect target's website, the master system may also check whether the text, graphics and other information contained on the website was not altered by intruders. The master system may also test functionality of target's e-commerce and other on-line applications to assure that the entire web system is operational and any problems may be addressed immediately. The master system also tests and verifies external (Internet) routing information, DNS info, netbios information, access control, etc. (Hrabik, Paragraph [0069].)

Thus, Hrabik is not concerned with comparing a first mapping to a second mapping and identifying at least one discrepancy between the first and second mapping, as recited in each of claims 1, 16, and 19; or a detector further adapted to compare the first mapping to the second mapping and to identify at least one discrepancy between the first mapping and second mapping, as recited in claim 21, as amended herein. Hrabik performs no such comparison between any first and second mapping. Rather, Hrabik is concerned with making sure a computer can get to a particular network's website, and that e-mail of a user goes to the proper server. (Hrabik, Paragraph [0069].) It does this by attempting to connect to various system resources by accessing their addresses. (Hrabik, Paragraph [0069].) Hrabik also discloses accessing

information at a Whois database of the registration provider to ensure that contact and authorization information has not been changed. (Hrabik, Paragraph [0069].) However, Hrabik does not teach or suggest that this information is a mapping of a namespace to a resource, not does it teach or suggest that any such mapping will be compared to a second mapping. Hrabik also does not teach or suggest a method or apparatus for identifying at least one discrepancy between a first mapping and a second mapping. Though Hrabik mentions that DNS information may be tested and verified, it provides no details of how this could possibly be accomplished. For at least these reasons, Hrabik does not teach or suggest all of the limitations of each of claims 1, 16, 19, and 21.

Albitz fails to cure the deficiencies of Hrabik because Albitz is also not concerned with comparing a first mapping to a second mapping and identifying at least one discrepancy between the first and second mapping, as recited in each of claims 1, 16, and 19; or a detector further adapted to compare the first mapping to the second mapping and to identify at least one discrepancy between the first mapping and second mapping, as recited in claim 21, as amended herein.

Albitz is directed to a conventional DNS system. Albitz is referenced in the Background section of the instant Application (located on Pages 1-2 of the instant Application), and describes a conventional configuration and function of nameservers typically used in the Internet and enterprises for resolving names to IP addresses. Specifically, it discloses a method whereby a user may copy information about a zone corresponding to a system resource. (Albitz, Page 220, “Zone Transfers,” Paragraph 1.) Zone data can be transferred to an output file. (Albitz, Page 220, “Zone Transfers,” Paragraph 3.)

Even if such zone data can be considered a mapping, and Applicants in no way concede that it can, Albitz does not teach or suggest performing a comparison between any first and second mapping. Rather, Albitz merely discloses the idea of transferring zone data into an output file. (Albitz, Page 220, “Zone Transfers,” Paragraph 3.) Albitz also does not teach or suggest a method or apparatus for identifying at least one discrepancy between a first mapping and a second mapping. For at least these reasons, Albitz does not teach or suggest all of the limitations of each of claims 1, 16, 19, and 21.

Accordingly, independent claims 1, 16, 19, and 21 are patentable for at least the reasons described above. Each of claims 4, 5, 7, 10, 13–15, 20, and 21, depend directly or indirectly

from one of independent claims 1, 16, 19, and 21, and are patentable at least for the same reasons as the independent claim from which they depend, respectively. For at least all of the above reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1, 4-5, 7, 10, 13-16, and 19-21 under 35 U.S.C. § 103(a).

**CONCLUSION**

In view of the foregoing amendments and remarks, reconsideration is respectfully requested. This application should now be in condition for allowance; a notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicant's attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50/2762.

Respectfully submitted,  
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